



National Association of Flood & Stormwater Management Agencies
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Testimony of the National Association of Flood And Stormwater Management Agencies

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Reducing Hurricane and Flood Risk in the Nation

U.S. House of Representatives
Transportation and Infrastructure Committee

Water Resources and Environment Subcommittee
Rep. John Duncan, Chairman

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I am very pleased to present this testimony on approaches to reducing the nation's risk from floods and hurricanes on behalf of the National Association of Flood and Stormwater Management Agencies (NAFSMA).

Background on NAFSMA

NAFSMA is a national organization based in the nation's capital that represents more than 100 local and state flood and stormwater management agencies. Its members serve a total of more than 76 million citizens and as a result, we have a strong interest in the issues the committee is discussing today.

The mission of the Association is to advocate public policy and encourage technologies in watershed management that focus on issues relating to flood protection, stormwater and floodplain management in order to enhance the ability of its members to protect lives, property, and economic activity from the adverse impacts of storm and flood waters. Many of NAFSMA's members are currently non-federal partners with the U.S. Army Corps of Engineers in water resources projects, including flood management and environmental restoration projects.

Formed in 1979, NAFSMA works closely with the Corps, as well as the Federal Emergency Management Agency and the U.S. Environmental Protection Agency to carry out its mission. NAFSMA members are on the front line protecting their communities from loss of life and property. Therefore, the organization is keenly aware that flood management is a wise and necessary investment required first to prevent loss of life and ensure the safety of our citizens and secondly, to prevent damages to peoples' homes and businesses and protect them from economic disruption. Flood management has proven to be a wise investment that pays for itself by preserving life and property, thereby reducing the probability of repeat requests for federal disaster assistance.

We appreciate the committee's interest in these critical issues and look forward to working with you to develop a wise and sustainable approach to protecting our citizens from the risk of flooding and hurricanes.

The last few months have been devastating for the nation's Gulf Coast region and our members have discussed a number of approaches outlined

below that we hope will be considered by Congress as it moves forward in response to the destruction and loss of life that occurred as a result of this year's devastating hurricanes and resulting floods.

We suggest that the Water Resources Subcommittee strongly consider the following recommendations put forward by NAFSMA as you work to develop a solid and well-thought out response to these recent losses.

Re-Examination of our Prioritization for Funding Flood Control Projects

In the past few years, more and more emphasis has been placed on achieving the best economic value for federal involvement in flood management projects. We ask that the Principles and Guidelines for Corps of Engineers flood management projects be reviewed with an eye toward safety first. While our members are committed, as you are at the federal level, to ensuring that the taxpayer receives the best possible reward for dollars spent on flood management, we also feel that we need to assess the risk faced by some of the nation's urban areas due to aging infrastructure issues. We are currently driven by a benefit cost analysis that does not adequately address the human risk factor in its formula. With these issues driving our allocation process for federal dollars, the nation's flood management agencies are put at a disadvantage in trying to work with the federal government to meet the nation's flood management needs.

We need to develop a resource allocation system that adequately addresses the risks to our nation's urban populations from flooding and hurricanes. When concepts of providing Category 5 protection are discussed, we need to ensure that the areas where there is a strong potential for loss of life are addressed in an appropriate manner against other economic or environmental benefits. Throughout the United States, densely populated urban areas have been protected by flood control infrastructure, which is now aging. Given the large number of lives at stake and the substantial fiscal consequences, there is a strong Federal interest in ensuring that measures are taken to minimize the risks to the population associated with extreme flood events.

Currently, however, public safety is not adequately accounted for in the prioritization of investments in federally-partnered flood management projects. The benefit-cost analysis that serves as the primary criteria for flood management investments at the federal level does not account for

public safety. Instead, it focuses exclusively on the economic benefits of protecting properties and public infrastructure.

Let's develop a set of performance measures which encourages reduction in risk to our citizens from catastrophic flooding. Reducing these risks provides strong economic benefits. The amount of funding needed to address the damages, recovery and rebuilding efforts on the Gulf Coast should be strong evidence that this nation needs to commit more federal dollars to needed flood management efforts.

Incentive-Based Cost Sharing

In 1986, our local flood managers worked with Congress to establish cost sharing requirements for Corps-partnered projects. It has been almost twenty years since those concepts were adopted. The time is ripe to closely examine our current planning and allocation process to determine if we are indeed moving in the direction we had hoped with this approach.

NAFSMA urges this committee to consider an incentive-based cost sharing approach that would reduce local cost sharing requirements for communities that adopt and enforce comprehensive floodplain and flood water management measures to reduce flood risks to their populations and properties.

A more balanced and thoughtful approach to address public safety and environmental concerns must be developed. Our agencies couldn't be more committed to achieving the best possible environmental results when developing flood management projects. We feel that integrated approaches to watershed management are indeed the best use of our resources. Striving to make a flood or stormwater management project achieve the best possible environmental, and in some cases recreational results, for local and state agencies should be a key driver for our nation's water resources programs. We do, however, feel that in cases where structural approaches are needed, which is the case in many of our communities across the nation, we need to ensure that these necessary systems are able to be maintained.

Streamlined Permitting Process for Public Safety Agencies and Projects

In cases where emergencies exist, or could exist, due to threats to the existing flood management system, streamlined permitting processes must

be made available to local agencies. Our agencies have often been delayed in carrying out routine maintenance activities needed to keep their flood management systems operating at optimal levels, by their inability to obtain necessary federal permits in a timely manner, if at all.

Extreme examples have involved the inability of our agencies to clear flood channels of vegetation because of the time and mitigation needed to apply for and receive a section 404 permit. Our member agencies have even been faced with one federal agency telling them that the channels must be cleared or National Flood Insurance claims would be subrogated against the flood control agency, while another federal agency (and in some cases state water quality agencies) is telling them that they cannot carry out this necessary maintenance activity.

NAFSMA Supports A National Levee Study

There needs to be a federal commitment made to first, assess the state of the nation's flood management infrastructure and then, to carry out a federal flood safety maintenance and repair program. At this point, there is no national database that exists to alert federal and local officials where potential problems may develop across the nation. While we have sophisticated weather monitoring systems that can predict a storm's path and its level of intensity, we simply don't have the data we need to accurately predict how our nation's flood management systems can respond to these threats. We need a levee assessment program that identifies not only federally-owned and operated levees, but local levees and other flood control structures as well. Many of our communities, both large and small, depend on levees and other structural systems for flood protection that have been built solely by the locality or state and these structures are aging and are potentially in need of repair.

NAFSMA strongly supports the creation of a national levee assessment administered at the federal level, but developed with the input of local, state and regional officials so that it can be structured in way to best provide the information needed at both the federal and local levels.

Other federal agencies, such as the Federal Emergency Management Agency, also need to have a role in such an effort. We know that the problems this country is facing as a result of aging infrastructure in the flood

management area are real and that such an assessment is needed. We stand ready to assist in developing and implementing such an approach.

Raise the Funding Limit on WRDA Section 215 Projects

NAFSMA members have suggested that one potential approach to help meet the nation's flood management needs would be to raise the funding limit on Section 215 projects. Section 215 of the Flood Control Act of 1968 provides for reimbursement to a non-federal sponsor for construction of a part of a federally-partnered flood management project authorized under the Water Resources Development Act. A higher limit would provide an opportunity for non-federal entities to undertake a larger portion of the project, potentially stretching limited federal dollars and allow for faster construction of projects.

Creation of Flood Management Technical Advisory Committee

NAFSMA strongly supports the creation of a National Technical Advisory Committee on Flood Management. Our members feel that the lead federal agencies in this effort should be the U.S. Army Corps of Engineers, the Federal Emergency Management Agency, the Natural Resources Conservation Service and the Department of Interior's Bureau of Reclamation. Also participating in this committee should be representatives of the U.S. Environmental Protection Agency and the U.S. Geological Survey, as well as State and local representatives with expertise in flood and stormwater management, as well as local and State emergency response officials.

We would like to see the mission of this Advisory Group be focused on the facilitation and coordination of federal policies and programs related to flood management. It would be extremely helpful if this group could develop joint policy recommendations that could be considered by the administration for future flood prevention, response and recovery planning.

Other Issues

Although the following issues are outside of the purview of this Subcommittee, NAFSMA believes that they are important components of a unified national response to the recent disasters.

Removal of FEMA from the Department of Homeland Security

NAFSMA would like to raise the need to move the Federal Emergency Management Agency outside of the structure of the larger Homeland Security Administration. We have been concerned that FEMA would inevitably lose its needed independent ability to mitigate against and quickly respond to natural disasters in such a large agency as the Department of Homeland Security.

While NAFSMA strongly supports the creation and the needed work of DHS, we feel that an agency with a primary focus on natural disasters is needed.

Continue Adequate Funding of FEMA's Map Modernization Program

Accurate Flood Insurance Rate Maps are an essential part of a comprehensive national floodplain management plan. To ensure that these maps are available to all levels of government as soon as possible, NAFSMA strongly supports continued adequate funding of FEMA's Map Modernization Program.

Mitigation Activities

The FY03 budget for FEMA reduced the Hazard Mitigation Grant Program (HMGP), which is used for post-disaster mitigation, from the previously authorized 15% of disaster relief funds to 7.5%, and also established a competitive pre-disaster mitigation grant program. NAFSMA believes that the HMGP authorization should be returned to 15%, and that both pre- and post-disaster mitigation should be adequately funded.

In closing, NAFSMA very much appreciates the opportunity to present our thoughts on these critical national issues to the Subcommittee for consideration. We stand ready to work with you on these important issues and would welcome any of your questions.